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*Attorneys for Defendants Ethicon, Inc. and
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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORLAND DIVISION

BARBARA SMITH and GARY SMITH,

Plaintiffs,

v.

ETHICON, INC., ETHICON LLC and
JOHNSON & JOHNSON,

Defendants.

Civil No.: 3:20-cv-00851-MO

**DECLARATION OF JEANNE F.
LOFTIS IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT
OF ITS MOTION TO EXCLUDE THE
CASE-SPECIFIC TESTIMONY OF
DANIEL ELLIOTT, M.D.**

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**DECLARATION OF JEANNE F. LOFTIS IN SUPPORT OF
DEFENDANTS' REPLY IN SUPPORT OF ITS MOTION TO
EXCLUDE THE CASE-SPECIFIC TESTIMONY OF DANIEL
ELLIOTT, M.D.**

I, Jeanne F. Loftis, hereby declare as follows:

1. I am over the age of 18 years and am a citizen of the United States. I make this declaration based on personal knowledge or belief and am competent to testify to matters contained herein.
2. Attached hereto as **Exhibit 1** is a true and correct copy of the January 31, 2017 deposition transcript of Peter Zenthofer, M.D.

I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.

DATED: February 15, 2022

By /s/ Jeanne F. Loftis
Jeanne F. Loftis

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Page 2